

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**LAURA FARINA,**

**Plaintiff,**

**v.**

**MIDLAND CREDIT  
MANAGEMENT INC.,**

**Defendant.**

:  
:  
:  
:  
:  
:  
:  
:  
:  
:  
:

**CASE NO.**

**NOTICE OF REMOVAL**

**PLEASE TAKE NOTICE** that on this date, Defendant Midland Credit Management, Inc. (“MCM”) hereby removes the above-captioned matter to this Court from the Court of Common Pleas of Pike County, Pennsylvania and in support thereof avers as follows:

1. MCM is the Defendant in a civil action originally filed on January 4, 2024, in the Court of Common Pleas of Pike County, Pennsylvania titled *Laura Farina v. Midland Credit Management, Inc.* and docketed to Case No. 61-2024 Civil.

2. This removal is timely under 28 U.S.C. § 1446(b). MCM received service of Plaintiff’s Complaint by Certified Mail on January 17, 2024.

3. Pursuant to 28 U.S.C. § 1446, attached hereto as Exhibit A are copies of all pleadings, process and orders filed in the state court action.

4. This Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1331, in that Plaintiff has filed claims against the Defendant alleging violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.*

5. On this date, MCM has provided notice of this Removal to counsel for Plaintiff and to the Court of Common Pleas of Pike County, Pennsylvania.

WHEREFORE, Defendant Midland Credit Management, Inc. respectfully removes this case to the United States District for the Middle District of Pennsylvania.

Respectfully submitted,

**MESSER STRICKLER BURNETTE, LTD.**

By: /s/ Lauren M. Burnette  
LAUREN M. BURNETTE, ESQUIRE  
PA Bar No. 92412  
12276 San Jose Blvd.  
Suite 718  
Jacksonville, FL 32223  
(904) 527-1172  
(904) 683-7353 (fax)  
[lburnette@messerstrickler.com](mailto:lburnette@messerstrickler.com)  
*Counsel for Defendant Midland Credit  
Management, Inc.*

Dated: February 6, 2024

**CERTIFICATE OF SERVICE**

I certify that on January 31, 2024, a true copy of the foregoing document was served on all unrepresented parties and counsel of record by electronic service and/or U.S. Mail, postage prepaid.

**MESSER STRICKLER BURNETE, LTD.**

By: /s/ Lauren M. Burnette  
LAUREN M. BURNETTE, ESQUIRE  
PA Bar No. 92412  
12276 San Jose Blvd.  
Suite 718  
Jacksonville, FL 32223  
(904) 527-1172  
(904) 683-7353 (fax)  
[lburnette@messerstrickler.com](mailto:lburnette@messerstrickler.com)  
*Counsel for Defendant Midland Credit  
Management, Inc.*

Dated: February 6, 2024